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CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

UNITED STATES OF AMERICA,)	Criminal Case No. <u>08CR0369-JLS</u>
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	<u>(Superseding)</u>
v.)	
)	Title 8, U.S.C.,
CHEONG SAU WONG (1),)	Sec. 1324(a)(2)(B)(ii) -
XU JUN LEE (2),)	Bringing in Illegal Aliens for
)	Financial Gain; Title 8, U.S.C.,
Defendants.)	Sec. 1324(a)(2)(B)(iii) - Bringing
)	in Illegal Aliens Without
)	Presentation; Title 18, U.S.C.,
)	Sec. 2 - Aiding and Abetting;
)	Title 8, U.S.C.,
)	Secs. 1324(a)(1)(A)(ii) and
)	(v)(II) - Transportation of
)	Illegal Aliens and Aiding and
)	Abetting

The grand jury charges:

Count 1

On or about January 28, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Ming Zhou Zhu, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 2

On or about January 28, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Ming Zhou Zhu, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii), and Title 18, United States Code, Section 2.

Count 3

On or about January 29, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Ming Zhou Zhu, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 4

On or about January 28, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Liangneng Jiang, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien

1 for the purpose of commercial advantage and private financial gain; in
2 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
3 and Title 18, United States Code, Section 2.

4 Count 5

5 On or about January 28, 2008, within the Southern District of
6 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
7 to violate the immigration laws of the United States, knowing and in
8 reckless disregard of the fact that an alien, namely, Liangneng Jiang,
9 had not received prior official authorization to come to, enter and
10 reside in the United States, did bring to the United States said alien
11 and upon arrival did not bring and present said alien immediately to
12 an appropriate immigration officer at a designated port of
13 entry; in violation of Title 8, United States Code,
14 Section 1324(a)(2)(B)(iii), and Title 18, United States Code,
15 Section 2.

16 Count 6

17 On or about January 29, 2008, within the Southern District of
18 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
19 to violate the immigration laws of the United States, knowing and in
20 reckless disregard of the fact that an alien, namely, Liangneng Jiang,
21 had come to, entered and remained in the United States in violation
22 of law, did transport and move said alien within the United States in
23 furtherance of such violation of law; in violation of Title 8, United
24 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 7

On or about January 28, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Yuhai Wang, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 8

On or about January 28, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Yuhai Wang, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii), and Title 18, United States Code, Section 2.

Count 9

On or about January 29, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Yuhai Wang, had come to, entered and remained in the United States in violation of

1 law, did transport and move said alien within the United States in
2 furtherance of such violation of law; in violation of Title 8, United
3 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

4 Count 10

5 On or about January 28, 2008, within the Southern District of
6 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
7 to violate the immigration laws of the United States, knowing and in
8 reckless disregard of the fact that an alien, namely, Xuzai Dong, had
9 not received prior official authorization to come to, enter and reside
10 in the United States, did bring to the United States said alien for
11 the purpose of commercial advantage and private financial gain; in
12 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
13 and Title 18, United States Code, Section 2.

14 Count 11

15 On or about January 28, 2008, within the Southern District of
16 California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
17 to violate the immigration laws of the United States, knowing and in
18 reckless disregard of the fact that an alien, namely, Xuzai Dong, had
19 not received prior official authorization to come to, enter and reside
20 in the United States, did bring to the United States said alien and
21 upon arrival did not bring and present said alien immediately to an
22 appropriate immigration officer at a designated port of
23 entry; in violation of Title 8, United States Code,
24 Section 1324(a)(2)(B)(iii), and Title 18, United States Code,
25 Section 2.

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Count 12

On or about January 29, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Xuzai Dong, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 13

On or about January 28, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Liqiu Lin, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 14

On or about January 28, 2008, within the Southern District of California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Liqiu Lin, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of

entry; in violation of Title 8, United States Code,
Section 1324(a)(2)(B)(iii), and Title 18, United States Code,
Section 2.

Count 15


On or about January 29, 2008, within the Southern District of
California, defendants CHEONG SAU WONG and XU JUN LEE, with the intent
to violate the immigration laws of the United States, knowing and in
reckless disregard of the fact that an alien, namely, Liqiu Lin, had
come to, entered and remained in the United States in violation of
law, did transport and move said alien within the United States in
furtherance of such violation of law; in violation of Title 8, United
States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

DATED: April 16, 2008.

A TRUE BILL:


Foreperson

KAREN P. HEWITT
United States Attorney

By: 
A. DALE BLANKENSHIP
Assistant U.S. Attorney